DECLARATION OF

I, make the following declaration based on my personal knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

- 1. My name is regarding the matters described below.
- 2. I am a citizen of the United States. I live in Winston-Salem, North Carolina. I have been married to C.O. since 2021.
- 3. In or around September 2015, my husband won protection under the Convention Against Torture (CAT) from El Salvador based on his fear of gangs. He was released from immigration detention after proceedings in front of an immigration judge.
- 4. In mid-May 2025, officers from U.S. Immigration and Customs Enforcement (ICE) came to the state probation office in Winston-Salem, North Carolina when my husband had an appointment. On that day, I accompanied my husband to the appointment and waited for him in the car. After a few hours of waiting, I went into the building to check on him and that is when I learned that ICE officers had taken him.
- 5. Immigration officers moved my husband between different immigration detention centers in North Carolina, Louisiana, Guantanamo Bay, and Arizona. I talked with my husband on the phone while he was detained. He had tried to contact his lawyer while he was detained, but immigration officers would move him between detention facilities before she could contact him. Immigration officers in the detention centers repeatedly tried to get him to sign deportation papers to Mexico, but he refused to sign.
- 6. On or around October 8, 2025, my husband called me from Mexico, using a phone that I believe officers let him use. He told me that U.S. immigration officers drove him from a U.S. detention center to the Mexico border and handed him over to Mexican authorities. When we spoke, he told me he was scared and that he did not know what was going to happen to him.
- 7. On October 9, 2025, in the morning, he called me from a jail in El Salvador. He told me that Mexican officers drove him to the Guatemalan border and handed him over to Guatemalan officers. Guatemalan officers then drove him to the border with El Salvador.
- 8. Later that same day, around 8 PM ET, he called me again and told me that the Salvadoran officers told him they were going to send him to CECOT, a maximum-security prison. He was terrified and crying. He said he told the officers he had protection from the United States and he didn't understand why he ended up there. He begged me to contact his lawyer to bring him back to the United States. He said the officers told him that he was going to spend the rest of his life in prison.

9. I have not heard from my husband since that phone call on October 9, 2025. I know his family in El Salvador has not heard from him either.

I declare under penalty of perjury that the above information is true and correct to the best of my knowledge.

Executed on this 13th day of November 2025 at Winston-Salem, North Carolina.